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The Commission received 17 comments on the proposal:

- five from associations (the Greater Houston Partnership, NARO-Texas, the Permian Basin Petroleum Association (PBPA), The Texas Industry Project (TIP), and the Texas Oil and Gas Association (TXOGA)),
- ten from companies or organizations, and
- two from individuals.

The Commission also received one comment submitted on behalf of 37 Texas-based organizations and individuals. The Commission appreciates these comments.

SUPPORT - The Port of Corpus Christi Authority, the Greater Houston Partnership, the Carbon Neutral Coalition, Calpine Corporation, the Energy Advance Center (EAC), PBPA, TXOGA, TIP, and Denbury Carbon Solutions, LLC (Denbury) expressed support for the Commission's Class VI primacy application to the EPA. The Environmental Defense Fund (EDF) commented that, in most respects the Commission's proposed rules are technically excellent and EDF is generally supportive of the Commission's approach. The Commission appreciates the support of these commenters.

OPPOSE - Commission Shift and the Texas-based organizations and individuals commented that they do not support the Commission's pre-application for Class VI primacy.

- 1) These commenters believe the Commission's oversight and response to emergencies and active contamination caused by modern and legacy wells is weak.
- 2) In addition to changes recommended in Chapter 5, the Texas-based organizations and individuals recommended the Commission consider a thorough overhaul of its monitoring and enforcement programs for both the oil and gas division and the pipeline safety department. [TX response in page 7]
- 3) The Texas-based organizations and individuals oppose the current annual Oil and Gas Division Monitoring and Enforcement Strategic Plan required by House Bill 1818 because it has proven to be slow and insufficient in addressing the many serious structural problems with monitoring and enforcement at the Commission
- 4) PAGE 4 – EJ comment

RESPONSE TO COMMENTS

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